

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

PHARMMD SOLUTIONS, LLC,

Plaintiff,

v.

PERFORMRX, LLC and  
DENISE KEHOE,

Defendants.

Case No. 3:11-CV-00255

Judge Haynes

**DEFENDANT DENISE KEHOE'S MOTION FOR LEAVE TO FILE  
A REPLY MEMORANDUM IN SUPPORT OF HER  
EMERGENCY MOTION FOR LIMITED EXPEDITED DISCOVERY ORDER**

Pursuant to Local Rule 7.01(b), Defendant Denise Kehoe ("Kehoe") respectfully moves this Court for leave to file a Reply Memorandum in Support of her Emergency Motion for Limited Expedited Discovery Order.

As discussed in the accompanying Reply Memorandum, Plaintiff PharmMD Solutions, LLC's ("Plaintiff") arguments fail because, *inter alia*, it fails to recognize that Mr. Bartholomew has necessary information relevant to Kehoe's defenses in this matter, including Plaintiff's wrongful termination of Kehoe, Plaintiff's waiver of the restrictive covenant at issue in this matter (both of which relate to non-enforceability of such restrictive covenant), Plaintiff's failure to file this lawsuit for over seven (7) months after learning of Kehoe's employment with Defendant PerformRx, LLC, and his allowance of Kehoe to download information at the time of termination and take such information with her, which Plaintiff now claims is confidential. In support of her Motion for Leave to File Reply Memorandum, Kehoe attaches her Affidavit dated March 31, 2011 as Exhibit

*Quinn*  
*This motion*  
*is GRANTED*  
*will be*  
*4-4-11*